



BellSouth Telecommunications, Inc.  
333 Commerce Street, Suite 2101  
Nashville, TN 37201-3300

guy.hicks@bellsouth.com

REGULATORY AFFAIRS

Guy M. Hicks  
General Counsel

September 24, 2001

615 214 6301  
Fax 615 214 7406

EXECUTIVE SECRETARY

VIA HAND DELIVERY

David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

Re: *Docket to Determine the Compliance of BellSouth  
Telecommunications, Inc.'s Operations Support Systems with State  
and Federal Regulations*  
Docket No. 01-00362

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth's Objections to First Interrogatories and Request for Production of Documents of AT&T and SECCA. Copies of the enclosed are being provided to counsel of record.

Very truly yours,

Guy M. Hicks

GMH:ch  
Enclosure

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

In Re:       *Docket to Determine the Compliance of BellSouth Telecommunications, Inc.'s Operations Support Systems with State and Federal Regulations*

Docket No. 01-00362

**BELLSOUTH'S OBJECTIONS TO FIRST INTERROGATORIES AND  
REQUEST FOR PRODUCTION OF DOCUMENTS OF AT&T AND SECCA**

BellSouth Telecommunications, Inc. ("BellSouth") hereby files the following objections to the First Interrogatories and Request for Production of Documents of AT&T and SECCA:

**INTERROGATORIES**

Interrogatory No. 2: BellSouth objects to this Request on the grounds that it is overly broad and unduly burdensome. Notwithstanding these objections, BellSouth will respond to this Request as narrowed by AT&T in North Carolina Docket P-55, Sub 1022.

Interrogatory No. 3: BellSouth objects to this Request as overly broad and unduly burdensome. The conference calls referenced in this Request spanned over a year and involved a myriad of BellSouth personnel. It is overly burdensome to request that BellSouth recreate the attendees at every conference call. Moreover, this Request is not relevant in that BellSouth will provide AT&T the names of the managers of each portion of the third party test.

Interrogatory No. 7: BellSouth objects to this Request as overly broad and unduly burdensome. BellSouth admits that there are differences between the Georgia Test and the Florida Test. These differences are set forth in the Master Test Plans in Georgia and Florida. AT&T can compare the two test plans and set forth the differences. BellSouth has not undertaken such an analysis and it is unduly burdensome to require it to do so.

Interrogatory No. 21: BellSouth will respond to this Request as narrowed by the parties in North Carolina Docket No. P-55, Sub 1022.

Interrogatory No. 23: BellSouth will respond to this Request as agreed upon by the parties in North Carolina Docket No. P-55, Sub 1022.

Interrogatory No. 53: BellSouth objects to this Request on the grounds that it is not relevant nor reasonably calculated to lead to the discovery of admissible evidence. BellSouth admits it pays PWC for services performed for BellSouth by PWC. The amounts paid are not relevant to the subject matter of this proceeding.

#### DOCUMENT REQUESTS

Request No. 2: BellSouth objects to this Request on the grounds that it is not relevant nor reasonably calculated to lead to the discovery of admissible evidence. BellSouth admits that it paid KPMG for conducting the third party test in Georgia and Florida. The amounts paid are not relevant to the subject matter of this proceeding.

Request No. 6: BellSouth objects to this Request on the grounds that it is overly broad and unduly burdensome. BellSouth provides KPMG with enormous

quantities of data, as it does every CLEC. BellSouth cannot reconstruct all of the information provided to KPMG. BellSouth will consider a narrowed request.

Request No. 7: BellSouth objects to this Request as overly broad and unduly burdensome. BellSouth has made thousands of references to its third party test to the GPSC, CLECs and KPMG itself. The burden it would place on BellSouth to identify and produce all such references far outweighs any relevance of these documents. BellSouth will consider a narrowed request.

Request No. 8: BellSouth objects to this Request on the grounds that it is not relevant. The exceptions, exception responses and closure statements are public record. BellSouth's internal drafts of exception responses are irrelevant to the TRA's consideration of the Third Party Test. KPMG based its decision on the exception responses—BellSouth's internal documents, therefore, are not relevant to this proceeding.

Request No. 12: BellSouth objects to this Request on the grounds that it is overly broad and unduly burdensome. The conference calls referenced in the Request spanned over a year and involved a large number of BellSouth employees. The burden of producing the notes of these participants far outweighs the relevance of the documents, particularly in light of the fact that there were minutes taken of every call that are publicly available. As BellSouth told AT&T in North Carolina Docket P-55, Sub 1022, BellSouth will consider a narrowed request.

Request No. 14: BellSouth objects to this Request on the grounds that it is overly broad and unduly burdensome. The conference calls referenced in the

Request spanned over a year and involved a large number of BellSouth employees. The burden of producing the notes of these participants far outweighs the relevance of the documents, particularly in light of the fact that there were minutes taken of every call that are publicly available. As BellSouth told AT&T in North Carolina Docket P-55, Sub 1022, BellSouth will consider a narrowed request.

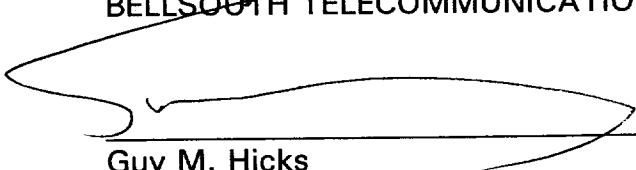
Request No. 24: BellSouth objects to this Request as overly broad and unduly burdensome. Notwithstanding these objections, BellSouth will respond as agreed to by the parties in North Carolina Docket No. P-55, Sub 1022.

Request No. 26: BellSouth objects to this Request as overly broad and unduly burdensome. Notwithstanding these objections, BellSouth will respond as agreed to by the parties in North Carolina Docket No. P-55, Sub 1022.

Request No. 46: BellSouth objects to this Request on the grounds that it is overbroad and unduly burdensome. BellSouth will produce documents responsive to this request from January 2001 forward.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.



Guy M. Hicks  
333 Commerce Street, Suite 2101  
Nashville, Tennessee 37201-3300  
(615) 214-6301

Fred J. McCallum  
Lisa Foshee  
675 W. Peachtree Street, Suite 4300  
Atlanta, Georgia 30375

## CERTIFICATE OF SERVICE

I hereby certify that on September 24, 2001, a copy of the foregoing document was served on counsel for known parties, via the method indicated, addressed as follows:

☐ Hand  
☐ Mail  
☒ Facsimile  
☐ Overnight

James P. Lamoureux  
AT&T  
1200 Peachtree St., NE, #4068  
Atlanta, GA 30367

☐ Hand  
☐ Mail  
☒ Facsimile  
☐ Overnight

James Wright, Esq.  
United Telephone - Southeast  
14111 Capitol Blvd.  
Wake Forest, NC 27587

☐ Hand  
☐ Mail  
☒ Facsimile  
☐ Overnight

H. LaDon Baltimore, Esquire  
Farrar & Bates  
211 Seventh Ave. N, # 320  
Nashville, TN 37219-1823

☐ Hand  
☐ Mail  
☒ Facsimile  
☐ Overnight

Henry Walker, Esquire  
Boult, Cummings, et al.  
P. O. Box 198062  
Nashville, TN 37219-8062

☐ Hand  
☐ Mail  
☒ Facsimile  
☐ Overnight

Jon E. Hastings, Esquire  
Boult, Cummings, et al.  
P. O. Box 198062  
Nashville, TN 37219-8062

☐ Hand  
☐ Mail  
☒ Facsimile  
☐ Overnight

Timothy Phillips, Esquire  
Office of Tennessee Attorney General  
P. O. Box 20207  
Nashville, Tennessee 37202

☐ Hand  
☐ Mail  
☒ Facsimile  
☐ Overnight

Charles B. Welch, Esquire  
Farris, Mathews, et al.  
618 Church St., #300  
Nashville, TN 37219

☐ Hand  
☐ Mail  
☒ Facsimile  
☐ Overnight

Terry Monroe  
Competitive Telecom Assoc.  
1900 M St., NW, #800  
Washington, DC 20036

